

MEMO ENDORSED

Federal Defenders
OF NEW YORK, INC.

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November 21, 2024

VIA ECF and Email

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
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**Re: United States v. Kenneth Ramsey
24 Cr. 618 (VEC)**

Dear Judge Caproni:

I write, with the consent of the Government, to respectfully request that the Court temporarily modify the conditions of Mr. Ramsey's bail to permit him to travel to his sister's home in Brooklyn and spend the day there to celebrate Thanksgiving on November 28, 2024. Mr. Ramsey's sister is the co-signer on his bond. Mr. Ramsey's Pretrial Services Officer, Jonathan Lettieri, informs me that, pursuant to his office's policy, Pretrial Services objects to requests for leave for social activities for individuals on home detention.

On November 12, 2024, Judge Wang imposed bail conditions, including the following: a \$10,000 personal recognizance bond to be cosigned by one financially responsible person; travel restricted to the Southern and Eastern Districts of New York; Pretrial supervision as directed; home detention with location monitoring technology as directed by Pretrial Services; that Mr. Ramsey continue or seek employment; and the surrender of travel documents with no new applications.¹ Mr. Ramsey has met all of the aforementioned conditions and is in compliance with them.

¹ This matter originated as a state prosecution and Mr. Ramsey was released on bail conditions in the state on September 16, 2024. At the time of his arrest on the federal warrant, Mr. Ramsey was in compliance with his state bail conditions. In fact, the state case is still a pending matter and Mr. Ramsey remains obligated to comply with the state's bail conditions.

Therefore, I respectfully request that the Court modify Mr. Ramsey's bail conditions to permit him to travel to his sister's house to celebrate Thanksgiving. Mr. Ramsey will provide Pretrial Services with the address, mode of travel, and any other information requested and abide by a time schedule set by Mr. Lettieri.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Amy Gallicchio

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cc: AUSA Andrew Thomas
PTSO Jonathan Lettieri

Application GRANTED. Mr. Ramsey must provide Pretrial Services with the address of his sister's residence and must be home by a time to be set by Pretrial Services.

SO ORDERED.

11/21/2024



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE